

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA                    )  
  )  
  ) CRIMINAL ACTION  
  )  
  ) NO. 04-10299-01-PBS  
  )  
MARIA ESCOBAR                                )  
  )

UNITED STATES' ASSENTED TO MOTION  
TO CONTINUE SENTENCING FOR ONE WEEK

The United States respectfully moves this Court to continue sentencing for defendant MARIA ESCOBAR now scheduled for March 29, 2006 for approximately one week. In support, the government submits the following:

1. The government needs additional time to prepare and file a 5K1.1 motion for downward departure before sentencing.
2. Undersigned counsel is also scheduled to appear in federal court in Worcester on Wednesday, March 29, 2006 at 2:15 p.m.
3. Defendant, through her counsel, assents to the granting of this motion, but indicates that he is available on Thursday, April 6, 2006.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By:

/s/ Neil J. Gallagher, Jr.  
Neil J. Gallagher, Jr.  
Assistant U.S. Attorney  
(617) 748-3397

Date: March 27, 2006

Certificate of Service

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and mailed to all those not participating in ECF.

/s/ Neil J. Gallagher, Jr.  
Neil J. Gallagher, Jr.